# Electronic Government
# At

# Farm Credit Administration
# 2003

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## Purpose

The purpose of this project is to determine: 1) FCA's position in terms of implementing its E-government initiatives; 2) where FCA stands in E-government among other agencies; 3) and unmask areas with the potential for improvement.

## Scope and Methodology

I conducted this project on E-government specifically to see if there are ways in to improve the FCA's website in terms of its usability, accessibility, and content management, and to determine whether internal or external processes could be improved or streamlined. Since the FCA is responsible for regulating the Farm Credit System, institutions that provide loans to farmers, ranchers, and aquatic concerns, it is essential that the users of FCA's website are able to obtain up-to-date information on current regulations and be able to communicate efficiently by electronic means. An additional focal point will be how to make FCA's website more appealing to potential job applicants.

In order to determine where FCA stands in creating a usable, accessible, and well managed website, it was necessary to conduct interviews with representatives from each office who aid in website development and maintenance. I also compared FCA's website with other agencies, particularly those who have excelled in this area.

I looked at internal and external Agency processes to see if they could be improved or streamlined. Research was conducted on Federal government agencies that excelled in E-government to learn of worthwhile initiatives. In doing this, I then compared the E-government initiatives at other agencies to FCA's to see if improvements can be made.

## Background

In 2001, President Bush initiated several government reform efforts, collectively known as the President's Management Agenda. This plan was designed to transform the government into a more citizen-centered, results oriented, and an overall more efficient system. Included in this plan is the expansion of Electronic Government or E-government, one of five key elements of the Agenda. Implementing E-government means taking full advantage of Internet-based technology to simplify citizen and business transactions with the government, save taxpayer dollars, and streamline government to citizen communications. This E-government effort carries the goals of making better use of information technology (IT) investments to save billions of dollars of wasteful federal spending, reduce the paperwork burden on citizens and business, and improve government response time to citizens.

The President's E-government Strategy outlines 25 high-payoff, cross-agency E-government initiatives to integrate agency operations and information technology investments. These

detailed initiatives can be used as a guide to determine each agency's position in E-government and in what areas they need to make progress in. The 25 initiatives are as follows:

### *Government-to-Citizens*

1. Govbenefits.gov – Online portal for access to government benefits available for citizens.
2. Recreation One-Stop – Provides citizens with a single-point of access to a web-based resource.
3. IRS Free Filing – Allows citizen access to free online preparation and electronic tax filing services to reduce burden and costs to taxpayers.
4. Online Access for Loans – Creates a single point of access for citizens to locate loans. Improves the efficiency and reduces burden of loan programs.
5. USA Services – Develop and deploy government-wide citizen customer service that will provide timely, consistent responses about government information and services.

### *Government-to-Business*

6. E-rulemaking – Allow citizen participation in government agency's rulemaking process, making it more efficient and accessible to all users, through streamlining.
7. Expanding Electronic Tax Products for Businesses – Reduces the number of tax-related forms that businesses must file, provides timely and accurate tax information to businesses, and increases the availability of electronic tax filing.
8. Federal Asset Sales – Improving asset recovery and disposition. Making it easier for agencies, businesses, and citizens to find and acquire/buy federal assets.
9. International Trade Process – Simplifying access for Small and Medium Enterprises to obtain information needed to conduct business abroad.
10. One Stop Business Compliance – Reduce burden on businesses by making it easier to comply with relevant laws and regulations at all levels of government.
11. Consolidated Health Informatics – Adopts a portfolio of existing health information interoperability standards, establishing a uniform "health language."

### *Government-to-Government*

12. Geospatial One-Stop – Provides federal and state agencies with access to map-related data enabling consolidation of redundant data.
13. Disaster Management – Provides emergency managers online access to disaster management-related information, planning and response tools.
14. Safecom – Provides interoperable wireless solutions for public safety organizations and ensures they can communicate and share information in emergency incidents.
15. E-Vital – Establishes common electronic processes for agencies to collect, process, analyze, verify, and share birth and death record information.
16. E-Grants – Single online portal for all federal grant customers, making it easier for potential customers to receive information about and apply for federal grants.

### *Internal Efficiency and Effectiveness*

17. E-Training – Online training and strategic human capital development solutions for all federal employees. Reduces instructor and travel costs.
18. Recruitment One-Stop – Providing online recruitment services to job seekers, including intuitive job searching, online resume submission, applicant data mining, and online feedback on status and eligibility.

19. Enterprise HR Integration – Streamlines and automates the exchange of federal employee human resources information.  Replaces official paper employee records.
20. E-Clearance – Streamlines and improves the quality of the current security clearance process.
21. E-Payroll – Consolidates 22 federal payroll systems to simplify and standardize federal human resources/payroll policies and procedures to better integrate payroll, human resources, and finance functions.
22. E-Travel – Provides a government wide web-based service to consolidate travel.  From travel planning and authorization to reimbursement, end-to-end service will leverage administrative, financial and information technology best practices to realize a significant cost savings and improved employee productivity.
23. Integrated Acquisition Environment – Creates a secure business environment that will facilitate and support cost-effective acquisition of goods and services by agencies.
24. E-Records Management – Provide guidance to aid agency maintenance of electronic records so that records can be used to support timely and affect decision-making, enhance service delivery, and ensure accountability.

### *All Focus Groups*
25. E-Authentication – Providing a secure infrastructure for online transactions, eliminating the need for separate processes for the verification of identity and electronic signatures.

The initiatives focus on four citizen-centered groups, each providing opportunities to transform delivery of services.  These four groups are Government-to-Citizens (G2C), Government-to-Business (G2B), Government-to-Government (G2G), and Internal Efficiency and Effectiveness (IEE).  The first five initiatives listed above are related to the Government-to-Citizen group.  The overall goal of this group of initiatives is to provide a one-stop, easy to use, single point of access for citizens to government services.  Initiatives six through eleven are categorized as G2B initiatives, where the focus is reducing the burden on businesses by adopting processes that enable the collection of data once for multiple uses and streamlining redundant data.  Initiatives twelve through sixteen focus toward improving relations between government agencies (G2G), with the focus on creating interoperable data and allowing federal, state, and local data to be shared and integrated.  Finally, initiatives seventeen through twenty-four above fall under improving IEE, with the goal of improving internal government agency processes and reducing costs through better use of modern technology.  Implementing the twenty-fifth initiative, E-Authentication, will improve all four-focus areas.[1]

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[1] "E-government Strategy: Implementing the President's Management Agenda for E-government"; April 2003; Office of Management and Budget; Retrieved July 18, 2003; www.whitehouse.gov/omb/egov/2003egov_strat.pdf

# REVIEW RESULTS

## FCA Website Analysis

In today's technologically centered environment, the proper maintenance of a website is an integral part of an information technology investment. The Internet is a powerful tool in communicating and conducting business. Taking full advantage of Internet-based technologies will only benefit the Agency. In assessing the website to determine if it was being maintained properly, I reviewed the accessibility, usability, and content management of the FCA website. The Office of the Chief Information Officer (OCIO) and the Office of Congressional and Public Affairs (OCPA) contracted in June of 2002 for an audit of FCA's website. This audit was more extensive than my review. There were several recommendations made in this audit, many of which have been addressed.

**Accessibility** – The accessibility of a website refers to the coding of a website in making sure that the website is as useful a tool for those with disabilities as it is for those who are not disabled. In 1998, Congress amended the Section 508 Rehabilitation Act of 1973 to require Federal agencies to make their electronic and information technology accessible to people with disabilities.[2] Inaccessible technology impedes an individual's ability to acquire and use information quickly and easily. Section 508 was enacted to eliminate obstacles in information technology, to make available new technologies to the disabled, and to encourage the development of new technologies that will achieve these goals. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology. Under Section 508 (29 U.S.C. 794d), agencies must give disabled employees and members of the public access to information that is comparable to the access available to those who are not disabled, regardless of the type of medium of the technology.[3]

The 2002 audit of the FCA website found that the FCA website was compliant with the sixteen Section 508 guidelines except for a minor coding error involving repetitive navigation. This minor coding error has since been corrected.

**Usability** – The usability of a website refers to its ease of navigation, or in other words, if the design of the website allows the user to obtain needed information easily. The navigation of a website is critical to overall design.

Compared to websites in other federal agencies, FCA's website appears to be state of the art. Nonetheless, an addition to the website that would ease navigation is the creation of a site map. A site map is a hierarchical visual model of the pages of a website. Site maps help users navigate through websites that contain more than one page by displaying for the user a diagram of the entire site's content. Comparable to the table of contents of a book, the site map simplifies

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[2] "508 Law"; Section 508.gov; Retrieved May 20, 2003; http://www.section508.gov/index.cfm?FuseAction=Content&ID=3

[3] "508 Law"

a search by alleviating unnecessary navigation through irrelevant content.  An example of a good site map can be found on FDIC's website (http://www2.fdic.gov/WebCat/sitemap.asp).[4]

Another way to ease navigation is to reduce the space created by the left hand navigation. The existing left hand navigation extends far below the content on various pages (see for example http://www.fca.gov/Publications%20About%20FCS.htm).  This observation underscores how the main page's content space could be utilized to foster more interesting or specific items of interest.  Another suggestion for easing navigation is repairing dead links (see http://www.fca.gov/Freedom%20of%20Information%20Act.htm and observe the "Frequently Asked Questions" link is not active).  Also, some links change colors when activated and others do not.  It would ease navigation if the layout style was more standard and consistent throughout the website (http://www.fca.gov/apps/legalopn.nsf is inconsistent with the rest of the layout).  These issues, initially recommended in the 2002 Audit of the FCA website, would yield a more user-friendly Website.   The OCIO and OCPA are approaching these issues in two ways.  The FCA is currently looking for a vendor to provide a content management system.  The OCIO is also leading an effort to redesign the website.

*Suggestion #1 – FCA should continue to redesign the website and address: a) the space created by the left hand navigation; b) repair the dead links; c) implement site wide standard of active and visited links, and d) make layout style consistent throughout the website.*

*Suggestion #2 – Create a site map of the website.  This is a standard feature that makes a website more user-friendly.*

**Content Management** – I focused on two ways to improve the content management of FCA's website: 1) Assessing the current procedures for placing content on the website and 2) Assessing the actual content of the website to compare the usefulness of FCA's electronic information and services to other Federal agencies.

The editorial integrity of Web content is always of the utmost importance.  The accuracy of a website is an imperative part of Web maintenance that is sometimes easily overlooked.  In addition, those delegated the responsibility of updating the website are an important consideration, especially when looking at the issue of accuracy.  In general, the fewer people delegated this job the better, but this must be weighed against the amount of content being added or updated.

The management of the content of FCA's website is a responsibility shared between the OCIO and the OCPA.  The CIO, and his office overlook the technical aspect of the website while an employee of OCPA is in charge of maintaining the accuracy of the content, and is therefore given the title of Web Content Manager.

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[4] "FDIC Site Map"; Federal Deposit and Insurance Corporation; Retrieved July 18, 2003; http://www2.fdic.gov/WebCat/sitemap.asp

There is one of two clearances all FCA staff must go through for requesting content to be posted on the website: 1) all OIG content to be posted is submitted directly to OCIO, is reviewed and is posted, or 2) all other offices' content is submitted to the Web Content Manager, is reviewed and then is posted by the OCIO.

Current management of the website could be improved.  The major issue of concern is the turnaround time between the submission of content for editorial review and submission of revised content to be placed on the Website.  This process is taking longer than desired.  The delay is caused because only one person, the Web Content Manager, reviews all submissions.

The authority of a Web Content Manager can be only given to someone who has gone through training.  Turnaround is not always lagging, only in certain situations.  If a routine update is submitted, it takes considerably less time than a whole new section, containing voluminous information.

There are options to consider.  One is to establish an Agency-wide style guide.  Style sheets would define how different elements of the website appear, such as headers and links.  These style sheets can then be applied to any Web page.  The end goal of implementing a style guide would be to promote greater consistency of Web content and revisions in the copy before it is submitted for editorial review.  This could potentially reduce the time spent on editorial review and make the process more efficient.  Both OCPA and OCIO agree that while a style guide would help, the staff would still need training on how to use it.  Furthermore, it would not reduce the current burden put on the Web Content Manager because it would still be that person's responsibility to go through all the information for accuracy.  An additional option is to obtain more resources for editorial review, to increase the overall time spent on review.  Allocating another staff member's time to help with the editorial review may significantly improve the turnaround time of content being updated on the Web.  Additionally, adding another editor for review adds to the integrity of the site.

Findings on the actual content available on the website and providing electronic services will be explained further in the following section titled "Electronic Services."

*Suggestion #3 – Consideration should be given to the worth of creating an Agency style guide and increasing resources to the Web Content Manager.*

## Electronic Services – Process Improvements

Being able to provide information and services through the website is crucial to business in today's technology centered environment.  In conducting research, I explored FCA's initiatives in streamlining paper-based business processes and found internal and external processes that could be improved.  It was also a goal to benchmark against other Federal agencies.  Through research, I reviewed five different areas, which could be improved.  These areas are as follows: 1) electronic FOIA requests; 2) the electronic rulemaking process; 3) electronic corporate applications; 4) modernization of call reports; and 5) one-stop recruitment.

**1) Freedom of Information Act requests** – The Freedom of Information Act (FOIA) gives any citizen the right to obtain Federal agency records unless the records, or portions of the records, are categorized as being under one or more of the nine FOIA exemptions (5 U.S.C. § 522a). A FOIA request is generally a request for access to records concerning a third party, an organization, or a particular topic of interest.

Subsection (a)(2) of the FOIA, agencies must make available a "reading room," a place where agency records are available for public inspection and copying. Under subsection (a)(2) of the FOIA, agencies must make four distinct categories of agency records available, which are: 1) final opinions and orders rendered in the adjudication of administrative cases; 2) specific agency policy statements; 3) certain administrative staff manuals; and 4) as of March 31, 1997, records disclosed in response to a FOIA request that "the agency determines have become or are likely to become the subject of subsequent requests for substantially the same records".[5]

In comparison to other agency's reading rooms I visited, the current FCA process for making electronic FOIA requests is efficient. Instructions for making FOIA requests are available in the FOIA section of the FCA website, as well as FOIA contact information, a fee schedule, a list of FOIA exemptions, links to FOIA appeals, and FOIA annual reports. Requests for Federal agency records may be sent and received by mail, facsimile, or electronic mail. There is also an electronic FOIA reading room, which is titled "Current Index", and contains links to the FCA Handbook of statutes and regulations and board policies, the FCA Examinations Manual, and FCA board policy statements.

One item that should be placed in the electronic reading room, which is not currently available, is a list of current FCA purchase cardholders. One reason to include this in the reading room is because it falls under Subsection (a)(2) of FOIA as records that have become subject to being frequently requested.

From January 2000 to June 2003, a total of 29 requests were made for FCA purchase cardholder information (8.3 requests per year). Some other government agencies have this information available in their reading rooms including: the Office of the Comptroller of the Currency (OCC), the National Credit Union Administration (NCUA), and the Small Business Administration (SBA). There doesn't seem to be any uniformity as to what information about the cardholders is available because all agencies list different specifics. The OCC provides a list with the cardholders' names and office addresses in PDF format.[6] The SBA, on the other hand, provides the cardholders' names, the office within the Agency each works for, their office addresses, and

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[5] "What Will You Find in the FOIA Reading Rooms"; U.S. Department of Justice; Retrieved July 18, 2003; http://www.usdoj.gov/04foia/04_2_1.html

[6] "Comptroller of the Currency Purchase Card List"; Office of the Comptroller of the Currency; Retrieved July 18, 2003; http://www.occ.treas.gov/foia/101602foia.pdf

their telephone numbers in HTML format.[7]  The NCUA provides a list with the cardholders' names, telephone numbers, and each cardholder's purchase limit in HTML format.[8]

A master list of current cardholders is maintained for FOIA purposes at FCA.  In the past there was resistance to putting cardholder information in the electronic reading room, however, this practice is common and will reduce the amount of individual responses to be prepared in response to FOIA requests for cardholder information.

***Suggestion #4 – Add FCA SmartPay Cardholder information to FCA's electronic reading room.***

**2)  E-rulemaking Process** - E-rulemaking/EDOCKET systems make the federal rulemaking process more accessible and enable citizens and small businesses to quickly access and comment on hundreds of open proposed rules from all federal agencies.  A process representative of democracy, it enables every interested citizen to participate in shaping the rules of government agencies, which affect us all.

Statistical analysis proves that the American public is interested in becoming involved in the rulemaking process on-line.  In 1997, before E-rulemaking was established, the U.S. Department of Transportation (DOT) conducted 155 rulemaking actions that generated about 3,000 public comments.  In 2000, with the rulemaking process streamlined, the agency received 63,000 public comments on fewer proposed rulemaking actions after accepting comments on-line.[9]   Also, according to OMB, another advantage of e-rulemaking is the cost savings achieved.  For example, the launching of Regulations.gov in January of 2003, a Web site specifically delegated for the E-rulemaking process for all federal agencies, is expected to save $94 million.[10]

Cost savings of Regulations.gov will be achieved through consolidation of the E-rulemaking process into one system for the entire Federal government.  In addition, the system will enhance accessibility for citizens and small businesses, allowing them to quickly access and comment on hundreds of proposed rules from all Federal agencies, from any location, and at any time.  The E-rulemaking initiative is a rapidly growing trend in government and two agencies that particularly excel in this area are the Environmental Protection Agency (EPA) and the SBA.

The EPA's EDOCKET system is a system that contains regulatory and non-regulatory dockets and documents that are available to be reviewed and commented upon online.  Documents contained in EDOCKET include all information considered by EPA in drafting a proposed or final rule.  These include Federal Registers, reports, hearing transcripts, and other materials related to the rulemaking process.  Comments include written opinions, data, and other materials submitted to the EPA that agrees, disagrees, and/or suggests alternatives to the proposed action.  Each time an Agency action is announced in the Federal Register, a docket is established and

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[7] "SBA Credit Card Holders"; Small Business Administration; Retrieved July 18, 2003; http://www.sba.gov/foia/creditcard.html

[8] "Visa Card Holders"; National Credit Union Administration; Retrieved July 18, 2003; http://www.ncua.gov/ref/Foia/cardholders.html
[9] "Regulations.gov to Transform U.S. Rulemaking Process and Save Nearly $100 Million"; January 16, 2003; Office of Management and Budget; Retrieved June 25, 2003; http://www.whitehouse.gov/omb/egov/press/regulations.htm

[10] "Regulations.gov to Transform U.S. Rulemaking Process and Save Nearly $100 Million"; January 16, 2003; Office of Management and Budget; Retrieved June 25, 2003; http://www.whitehouse.gov/omb/egov/press/regulations.htm

assigned a tracking number to accumulate materials throughout the development process.  The EDOCKET system allows users to search for these materials in three ways:

1. A "View Open Dockets" link that allows the user to search through dockets that are currently open for comment
2. A "Quick Search" link that allows the user to search across multiple fields for a particular docket or document
3. An "Advanced Search" link that allows the user to find dockets or documents with a specific search criteria including a full text search within the documents.

EDOCKET allows the user to participate in the rulemaking process by accepting comments online.  EDOCKET provides a Submit Comment screen that helps locate the docket for commenting, and allows the user to type their comments into an online form, attach a file, or both.  The EDOCKET system is an "anonymous access" system that does not require submission of any form of identity such as name, e-mail address or other contact information unless the user voluntarily provides it in the body of their comment(s).  However, it is recommended by the EPA that commenters provide some contact information in the case that they may need to contact them and request further information on the substance of their comment(s). The Dockets also accept comment submissions by mail, facsimile, e-mail, and in-person.  In addition, EPA posts comments in EDOCKET shortly after they receive them, usually within three business days.

The Office of Advocacy of the SBA recently launched a Regulatory Alerts web page to ease the rulemaking process and make the process more accessible for small business owners.  This page provides one-stop access to proposed regulations, ability to submit comments on proposals, direct access to Advocacy staff, and links to other regulatory related sites.  The Regulatory Alerts web page divides proposed regulations into easily understood subject areas, which are: Environmental; Procurement; Safety, Health, & Labor; Telecommunications; Tax; Transportation; Rules under Regulatory Review; and General.  Each proposed rule is then listed under its appropriate category, with a brief summary and the deadline for submission of comments.  Links to the full-proposed rules are available, as well as links to contact information for each rule and links for submitting comments electronically.  The links for submission of comments on proposed rules send you to www.regulations.gov, the federal government's site for citizen participation in rulemaking.

FCA's E-rulemaking process is generally efficient and comparable with best practices of government agencies.  Summaries of pending regulations and notices that are open for comment are readily accessible within three clicks.  Under each summary, the address to submit comments is displayed.  For those who wish to comment, they can send their comments by electronic mail through the Pending Regulations section of FCA's Website or through the Government-wide www.regulations.gov portal.  Written comments can also be sent by mail to the Regulation and Policy Division of the OPA.  In addition, the FCA is looking at implementing some new initiatives to better the E-rulemaking process.

The FCA Web-Base Access Group is advancing this process.  One of the key initiatives the group is working on includes a set up to allow the posting of comments to proposed regulations on the website, which should be available to the public in the near future.

**3) Electronic Corporate Applications** – Corporate Applications are forms filed by FCS institutions when they wish to request to do one of the following: a) to relocate bank headquarters or a specific branch; b) to merge/consolidate with another entity; c) a change in bank control, subsidiary power, etc. occurs; or d) to change bank/corporate name.

The OCC has been the first to lead the way in making this process more efficient and in accord with the President's E-government objectives. OCC has established a system called "E-corp" which allows for the electronic submission of corporate applications. E-corp, which began as a pilot program to enable participating national banks to make certain types of licensing filings electronically, is now being expanded to allow all national banks access to electronic filing of applications through the OCC's National BankNet web site.[11] The expanded program now permits national banks to submit any class of filings electronically to the OCC. In addition, OCC has available on its website the Corporate Licensing Manual[12], which outlines the process for making each type of bank filing they offer and sample applications for reference.

Currently, the FCA does not have an electronic corporate applications system. Corporate applications are submitted non-electronically, on paper. If there are any errors or incomplete applications, the requests for the modifications and the modifications are sent electronically. From the time of submission, FCA has a time limit of 60 calendar days to decide on whether to approve the application or not. During this time period, 10 business days are delegated for internal clearance of the application and another 10 business days are delegated for the Board's review. Whatever amount of time is left before that is given for the initial review of the application.

Interviews were conducted with the OPA and the OGC concerning streamlining the corporate application process. The FCA representatives were not able to identify the benefits of electronic submission of applications because the disclosures are simply too voluminous to submit electronically and there was a concern it might increase the amount of editing to be done.

**4) Modernization of Call Reports** – A Call Report is a set of financial data provided by financial institutions to their regulators that helps the financial regulators to monitor the health and activity of the institutions. Every FCS institution is required to file a Call Report with the FCA. The Report consists of a Certification Letter, a Report of Condition, a Report of Income, and supporting schedules. Its contents also include quarterly statements of condition and income and supplemental schedules for the balance sheet and income statement.

Financial institutions use Call Reports to communicate their financial and performance information on a quarterly basis to a broad audience, which includes the financial regulators, investors, and the public. Financial regulators use Call Report data as a window into the workings and vitality of the banking industry. It also assesses current and emerging risks that they need to be aware of at both the institutional level and the industry level.

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[11] Hawke, Jr., John D.; April 3, 2003; "Department of the Treasury: Office of the Comptroller of the Currency Electronic Filings"; Federal Register Vol.68 No.71/Monday April 14, 2003/Proposed Rules – 12 C.F.R. Part 5; Retrieved June 11, 2003; http://www.setonresourcecenter.com/register/2003/Apr/14/17890A.pdf

[12] Comptroller's Licensing Manual; Office of the Comptroller of the Currency; Retrieved June 11, 2003; http://www.occ.treas.gov/corpapps/corpapplic.htm

Modernizing the Call Report system is an emerging E-government initiative that other financial regulators are currently pursuing.  An interagency initiative, it is currently being undertaken by the Federal Financial Institutions Examination Council (FFIEC).  The Federal Deposit Insurance Corporation (FDIC), the Federal Reserve System (FRS), and the OCC are pursuing this initiative aimed at benefiting both the government and private sector.  The biggest problem with the current system among commercial banks is that by the time the Call Report data is collected, compiled, formatted, analyzed, and edited, it is on average 60 days old.[13]  The purpose of modernizing the Call Report process is to sufficiently streamline the data collection process and greatly enhance the way data is analyzed and utilized.  The primary objectives[14] are:

- To decrease the time between the receipt of Call Reports by the financial regulators and the public release of the Reports.
- To create a Central Data Repository (CDR) to increase the consistency of the data.  In addition, a CDR will allow standardized editing capabilities and consolidated collection and validation processes.
- To increase FFIEC Call Agencies' flexibility and speed to adjust collection systems to reflect ever-changing information needs.
- To decrease the overall cost of the entire Call Report process.
- To improve the transparency of FFIEC Call Agency data requirements by facilitating the exchange of information through standards, both from a content and technical perspective.

In order to accomplish this task of achieving consistency for the Call Report process, a formal Request for Proposal was distributed to build a Central Data Repository (CDR) using state of the art Internet technologies.[15]  Thus, in comes the Extensible Business Reporting Language (XBRL).  XBRL is an XML-based specification for publishing the financial information of an enterprise.  The standardization of the specification makes it easier for businesses to share their financial information with other businesses and with industry analysts across all software formats and technologies, including the Internet.  XBRL uses XML data tags based upon standardized accounting industry definitions to describe financial information for public and private companies and other organizations.[16]  In the reporting process, XBRL is used to "tag" data elements and map them to the regulatory reports.[17]  A "tag" is a command inserted in a document that specifies how the document, or a portion of that document, should be formatted.[18]  This

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[13] Battey, Phil; June 17, 2003; "Chairman Donald E. Powell Federal Deposit Insurance Corporation Remarks Before The Council For Excellence in Government Washington, DC"; Retrieved June 18, 2003; http://www.fdic.gov/news/news/press/2003/pr6403.html

[14] Slobodian, John and Conn, Tracy; "Call Report and FR Y-9 Report Modernization is Coming!"; Retrieved July 23, 2003; http://www.clevelandfed.org/DS/PDF/CallReportModernizationreport.pdf

[15] Slobodian and Conn

[16] What Is XBRL: The XBRL Specification"; Extensible Business Reporting Language; Retrieved July 22, 2003; http://www.xbrl.org/whatisxbrl/index.asp?sid=11; Copyright 2002 XBRL International

[17] Slobodian and Conn

[18] "Tag"; Webopedia.com; retrieved July 25, 2003; http://www.webopedia.com/TERM/t/tag.html

technology offers many benefits including the ability to add written remarks or explanations to financial data in order to add context to the numbers.  In addition, XBRL allows data to be entered only once, allowing the same information to be rendered in any form such as a printed financial statement, an HTML document for the company's website, an EDGAR filing document with the SEC, a raw XML file or other specialized formats such as credit reports or loan documents.[19]  XBRL will revolutionize the way such data is stored and reused by groups of interest such as regulators, investors, analysts, or the general public.

An interview with the OPA revealed that the FCA Call Report system is very similar to and is in fact modeled after other financial regulators such as the FDIC.  FCA requires every FCS institution to submit Call Reports on a quarterly basis.  The reporting dates are March 31, June 30, September 30, and December 31 of each year.  All Call Report schedules, except those required for the supplement, are required to be filed with the FCA within the 20th day following the report date for FCS banks (April 20th, July 20th, October 20th, and January 20th) and within the 30th day for associations and FCS service institutions.  Once the agency receives the Call Reports, the information in the reports is stored in Oracle database tables.  Once stored in Oracle, the information is available for internal users immediately and the institutions can view their own institution reports at this time as well.  However, in response to a request made by the Funding Corporation in March 2003, in which they asked FCA not to release its Call Reports on its public Web site until after they have published their System-wide analysis, the Call Reports are not available to the public in the same timely fashion.  The Funding Corporation is responsible for releasing System-wide performance results for all System institutions.  This request was made because FCA, in releasing their financial information on individual System institutions before allowing the Funding Corporation to release its information on a System-wide basis, could potentially be providing incomplete and/or false information to the public.  Since it typically takes the Funding Corporation 45 days after quarter-end to publish its press releases, FCA does not release its Call Reports until this time.

The FCA does not have the time delay problem experienced by other financial regulators with their Call Reports because FCA receives Call Reports from fewer institutions and less information is collected.

*Suggestion #5 – Two processes relating to the business conducted between FCA and the FCS institutions were reviewed for benefits through streamlining: 1) the corporate application process; and 2) the Call Report process.  I suggest the FCA continue to follow the development of these initiatives and study the benefits of the initiatives.*


**5)  Recruitment One-Stop** – New employee recruitment is an issue FCA has to confront constantly and it continues be one of FCA's top priorities to attract the most motivated, skilled, and talented of those seeking employment.  Many people seek information about employment opportunities with the federal government but often complain that the process is tedious and complicated.

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[19] "Section Four: What is XBRL"; Extensible Business Reporting Language; July 25, 2003; http://web.bryant.edu/~xbrl/xbrl/basicsbrl.htm

According to the E-government website[20], the recruitment one-stop initiative is mainly aimed at advancing the existing capabilities of the USAJOBS Federal Employment Information System, the government's central online source for federal employment postings.  In addition, the initiative will advance the current USAJOBS website to serve as a single application point to streamline the federal employment application process, improve service delivery to job applicants, and enhance the government's position as a prime target for top talent.  Specifically, new added improvements to USAJOBS will include: 1) improved job searching that will allow seekers to find jobs that best match their interests; 2) clearer, more understandable job announcements; 3) electronic resume submittal; 4) securing resumes on a central database so that seekers only have to submit a resume once; and 5) displaying application status for seekers to check online.[21]

Currently, there is a great deal of content on the FCA home page and in the "Careers at FCA" section where interested applicants can attain information about the structure, responsibilities, and goals of the Agency.  And while the initiative of further developing the USAJOBS website will help in simplifying the recruitment process, there are also a few additions FCA could contribute to its website to simplify the process as well.  A positive example of what can be done to improve recruitment is shown by the OCC.  There are some very impressive and attractive features in the "Careers at OCC" section of their website[22], some of which include: 1) list of job openings by geographical region with direct links to click on for each office to see if there are any openings available in that office[23]; and 2) a display of different career programs that can be pursued once established as an employee with OCC.[24] It would be beneficial to recruitment to considering adding similar elements displayed by OCC to the FCA careers page.

A further addition to the website that would improve the recruitment process would be to disclose FCA's diversity and Equal Employment Opportunity (EEO) initiatives.  Diversity is a major issue in the American culture, especially in the work place.  It is imperative that every employee feels as if they are accepted and are comfortable in the environment in which they work.  Consequently, creating a comfortable environment will allow employees to be more motivated in their work and will allow them to be increasingly productive.   Since the FCA deals with a diverse customer base, it is essential to have a diverse collection of staff and advertising diversity in recruiting will help FCA to further diversify its staff.  FCA excels in its EEO and diversity initiatives.  From a meeting with the EEO director of FCA, it was discovered FCA has many diversity and EEO initiatives which it could display on its website, some of the which include:

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[20] "Recruitment One-Stop"; Office of Management and Budget; Retrieved July 18, 2003; http://www.whitehouse.gov/omb/egov/internal/recruit.htm

[21] "Recruitment One-Stop"; Office of Management and Budget; Retrieved July 18, 2003; http://www.whitehouse.gov/omb/egov/internal/recruit.htm

[22] "Careers at the OCC"; Office of the Comptroller of the Currency; Retrieved July 18, 2003; http://www.occ.treas.gov/jobs/careers.htm

[23] "Current Job Openings"; Office of the Comptroller of the Currency; Retrieved July 22, 2003; http://www.occ.treas.gov/jobs/jobsrch.htm

[24] "Careers at the OCC"; Office of the Comptroller of the Currency; Retrieved July 18, 2003; http://www.occ.treas.gov/jobs/careers.htm

1. Active recruitment at Historically Black Colleges and Universities (HBCU) and Hispanic Colleges and Universities.
2. Participant as a sponsor of various career development programs for minority students in undergraduate and graduate studies – these programs, such as INROADS and the HACU International Internship Program, provide students the opportunity to intern at FCA, allowing them to gain challenging and valuable work experience.
3. Agency-wide training on diversity.
4. FCA Diversity Day held annually, which features various workshops on diversity and activities in celebrating the vast array of experiences, backgrounds, and ideas the staff bring to FCA.
5. The recent amending of FCA Board Policy Statement, published in September 2002, to reaffirm FCA's commitment to Equal Employment Opportunity and diversity.

***Suggestion #6 – Content additions should be made to the website to improve the recruitment process.  Additions include listing of job openings by geographical region with direct links for applying for the available positions, career programs available at the FCA, and EEO and diversity initiatives at FCA.***

A look at E-government trends and best practices in the Federal government leads me to conclude that FCA is in good standing.  E-Government is dynamic and it will be a challenge to keep pace.

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